

Cruz Valdivieso Figuera vs All Vip Care & Liz Velazquez McKinnon
Melendez, Angela on 10/25/2023

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 0:22-CV-61553-DIMITROULEAS/HUNT

CRUZ VALDIVIESO FIGUERA,

Plaintiff,

vs.

ALL VIP CARE INC. AND
LIZ VELAZQUEZ MCKINNON,

Defendant.

ORIGINAL

VIDEOTAPED DEPOSITION OF ANGELA MELENDEZ
TAKEN ON BEHALF OF THE DEFENDANT

OCTOBER 25, 2023
3:12 P.M. TO 4:02 P.M.

ALL PARTIES APPEARED REMOTELY
PURSUANT TO
FLORIDA SUPREME COURT ORDER AOSC20-23

REPORTED BY:
ARAMIS A. SANTOS, COURT REPORTER
NOTARY PUBLIC, STATE OF FLORIDA

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APPEARANCES OF COUNSEL

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ALSO, PRESENT:

Liz Mckinnon, Attendee
Diana Ramirez, Attendee

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1 VIDEOTAPED DEPOSITION OF ANGELA MELENDEZ

2 OCTOBER 25, 2023

3 THE COURT REPORTER: And we are now on the
4 record. Today's date is Wednesday, October 25th,
5 2023, and the time is approximately 03:00 p.m.

6 We are here for the deposition of Angela
7 Melendez in the matter of Cruz Valdivieso Figuera
8 versus All VIP Care, Inc. and Liz Velazquez
9 McKinnon. Case Number is 022-CV-61553-
10 Dimitrouleas/Hunt. United States District Court,
11 Southern District of Florida.

12 The Court Reporter is Aramis Santos for
13 Universal Court Reporting.

14 Would Counsels please introduce themselves for
15 the record, and following this I will swear the
16 witness in?

17 MR. POLLOCK: Attorney Brian Pollock for the
18 Plaintiff, Ms. Valdivieso Figuera.

19 THE COURT REPORTER: Mr. Goldberg, do you mind
20 stating your appearance for the record? Okay. I'll
21 just -- I'll proceed and swear the witness in.

22 Thereupon:

23 ANGELA MELENDEZ, was called as a witness, and
24 after having been first duly sworn, testified as
25 follows:

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1 THE COURT REPORTER: Counsel, you may proceed.

2 DIRECT EXAMINATION

3 BY MR. POLLOCK:

4 Q Good afternoon Ms. Melendez. My name is Brian
5 Pollock and I represent Cruz Valdivieso. I think you
6 knew her as Daisy. Can you hear me okay?

7 A Yes.

8 Q Okay. I'm going to ask you some questions and
9 then if you don't understand me, just let me know. If
10 you can't hear me or the connection breaks up, let me
11 know and I'll try to answer -- ask you the question so
12 you can understand it.

13 Because all I want to do is ask questions that
14 you can answer out loud with a yes or no. And if we
15 can't hear your answers, we're going to let you know.

16 Is that fair? That work for you?

17 A Okay.

18 Q Now, the reason why we're here is because All
19 VIP Care and Ms. McKinnon had identified you as a
20 witness who's going to testify at the trial of this
21 case.

22 So, that's why we're here. And there was a
23 request by All VIP and Ms. McKinnon and their lawyer to
24 have you appear next week by video conference at trial.

25 Were you aware that you were listed as a

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1 witness at trial by All VIP Care and Ms. McKinnon?

2 A I was aware that I was asked, but I also am
3 aware that I said I couldn't because I can't walk and I
4 can't be going around.

5 So, I said no, that I wasn't able to --

6 Q Okay. And if you can testify at trial like
7 we're doing today, were you'd be doing it through a
8 video or Zoom, is that something you can do?

9 MR. GOLDBERG: You need to repeat the
10 question, I think you went dark for a couple of
11 seconds.

12 BY MR. POLLOCK:

13 Q Okay. Next week would you be able to appear
14 at trial through this video conference like we're doing
15 today?

16 A You mean sit here and do this again?

17 Q I don't know if the Reporter got the answer.

18 THE COURT REPORTER: No, it had broken up.

19 BY MR. POLLOCK:

20 Q Okay. Ma'am, if you could repeat your answer.
21 The connection seems to be cutting in and out. I didn't
22 hear what you said.

23 MR. POLLOCK: Randy, can you hear us?

24 A You mean to sit here and --

25 MR. GOLDBERG: Mr. Reporter.

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1 MR. POLLOCK: We're not hearing the witness.

2 It's breaking up.

3 MR. GOLDBERG: Well, she did verbalize an
4 answer. Let me see if I move the phone closer, if
5 that would be better.

6 Can you see her gentlemen?

7 MR. POLLOCK: I mean, I can see --

8 MR. GOLDBERG: Can you see Ms. Melendez?

9 MR. POLLOCK: Yes.

10 MR. GOLDBERG: Okay. Ms. Melendez, repeat
11 your answer that you said a minute ago. Now that
12 the phone is closer to you.

13 A I asked if you mean sitting here and doing
14 this again next week.

15 BY MR. POLLOCK:

16 Q Yes.

17 A What would that be for?

18 Q You've been identified as a witness for trial.
19 And so, this is a deposition to find out what you know,
20 and the next week would be for you to testify at trial
21 like this and it'd be a jury in the courtroom.

22 A But the thing is, I always said no from day
23 one. I don't know anything about this trial.

24 Q Okay.

25 A I have nothing to do with it. And I'm still

1 being practically forced into it.

2 Q Got you.

3 A What can my testimony do?

4 Q That's what we're here to talk about today.

5 So, let's kind of get into it. And if you need a break
6 at any time, ma'am, just let me know and as long as it's
7 not in between a question and an answer, I'll
8 accommodate you so that way we can take a break, all
9 right?

10 A Okay.

11 Q All right. All right. Certain questions that
12 we normally ask at the beginning of a deposition. So, I
13 just want to ask, you know, what's your date of birth?
14 When were you born?

15 A August 2nd, 1946.

16 Q Okay. Where are you now?

17 A My apartment.

18 Q What's the address?

19 A 3670 Southwest 60th Avenue, Apartment 1,
20 Davie, Florida 33314.

21 Q How long have you lived there?

22 A I'm not sure, about maybe six years.

23 Q Okay. Do you live there with anybody else?

24 A No.

25 Q Okay. Who's with you today besides Mr.

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1 Goldberg?

2 A My caregiver.

3 Q And what's his or her name?

4 A Francisca.

5 Q Do you know who Francisca works for?

6 A VIP.

7 Q For how long have you received aide through
8 All VIP?

9 A I don't remember. Maybe two years. I don't
10 remember.

11 Q Okay. As far as your background, what's -- I
12 guess did you -- what's the highest level of education
13 that you earned? Did you graduate from high school, do
14 you have any college degrees?

15 A My master's degree was that I was promoted to
16 be a coordinator in a home health agency.

17 Q Okay. And then what about from like an
18 educational standpoint, did you graduate from high
19 school?

20 A Yes.

21 Q Did you take any college courses?

22 A Yes.

23 Q Did you get --

24 A I have --

25 Q -- a degree in college?

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1 A I have diploma from recreational leaders, and
2 I have a background of some medical field things.

3 Q Did -- what college did you attend?

4 A The University of Puerto Rico.

5 Q Did you graduate from there?

6 A From my class I did.

7 Q Okay. And do you understand that you took an
8 oath to tell the truth today?

9 A Yes.

10 Q Okay. And can we rely on your testimony that
11 you give today is the truth?

12 A Of course.

13 Q Okay. Have we ever met before?

14 A No.

15 Q Other than talking with one of my assistants
16 yesterday -- or excuse me, on Monday to coordinate your
17 deposition, have you ever spoken with anyone from my
18 office before?

19 A From your office, somebody came here and took
20 the information, but I think they were from Mr.
21 Goldberg.

22 Q Okay. Now, do you take any take any medical
23 conditions -- excuse me. That's not a good question.

24 Do you take any medications or have any
25 medical conditions that affect your memory?

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1 A Well, yes, I do I take two pills for my memory
2 because I forget things.

3 Q Have you been taking those medications for
4 months or for years?

5 A For years. The day I forget to take them, I
6 am not too good at remembering things.

7 Q Got you. Did you take those pills today?

8 A No.

9 Q Now, I represent -- I'm the attorney for Daisy
10 Valdivieso. Do you know who she is?

11 MR. GOLDBERG: Just listen to his questions
12 and answer his question, Ms. Melendez.

13 THE WITNESS: He's not saying nothing.

14 MR. GOLDBERG: That's okay. He will.

15 BY MR. POLLOCK:

16 Q Okay. Ms. Melendez, I represent -- I'm the
17 attorney for Daisy Valdivieso. Do you know who she is?

18 A Yes.

19 Q How did you meet Daisy?

20 A She came to work for me.

21 Q Okay. I guess in what capacity did she come
22 to work for you? Was that as an aide?

23 A Yes.

24 Q And was that through All VIP Care?

25 A Yes.

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1 Q Had you had other aides before Daisy whom you
2 worked with through All VIP Care?

3 A Yes.

4 Q And then after Daisy left, did you continue to
5 work with All VIP Care who provided you with aides?

6 A Yes.

7 Q As a result of anything that Ms. Valdivieso or
8 Daisy said to you, did you ever stop working with All
9 VIP Care?

10 A No.

11 Q For the past several years, have you been a
12 continuous client of All VIP Care?

13 A Yes.

14 Q Now, as far as who decided which agency to get
15 an aide through, was that your decision or was that a
16 decision that was made by another family member of
17 yours?

18 A No, that was decided by my case manager.

19 Q Now, when you have an aide that comes to you
20 through All VIP Care, are you required to sign any
21 documents to confirm that they actually work with you on
22 the dates and times they put down?

23 A Yeah, every week. I have to sign a paper that
24 says that I agree to the hours she's putting down.

25 Q Now, the last record that I saw where Ms.

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1 Valdivieso worked with you was the week of July 11th
2 through 16th, 2022. Do you remember Ms. Valdivieso
3 working with you July 11th through 16th, 2022?

4 MR. GOLDBERG: He'll ask you the question
5 again if you didn't hear it. Brian, I don't think
6 she heard the question clearly.

7 MR. POLLOCK: Okay.

8 BY MR. POLLOCK:

9 Q Ms. Melendez, let me ask this again. I don't
10 know that you heard me because of the connection. The
11 last record that I see in which Daisy worked with you
12 was the week of July 11th through 16th, 2022.

13 Do you remember Daisy working with you July
14 11th through 16th, 2022?

15 A I can't remember that far back. I know she
16 worked with me over a year ago.

17 Q Okay.

18 A But I don't know, how -- when it was.

19 Q Got you. As far as the documents that you
20 would sign these weekly visit records, would you look
21 them over to make sure they were right before you signed
22 them at the bottom?

23 A Yes.

24 Q And I can try to put it up on the screen, but
25 I think -- are you looking at an iPhone?

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1 A No.

2 MR. GOLDBERG: Yeah. Yeah, Brian. She used
3 my iPhone because the iPad was having the reception
4 problems.

5 MR. POLLOCK: Got you.

6 BY MR. POLLOCK:

7 Q All right. So, I think it's going to be too
8 small if I show you this record for you to make anything
9 out. Now, if the weekly visit record for the week of
10 July 11th through 16th shows that Ms. Valdivieso worked
11 with you for 46 hours that week and that you signed it.

12 Should we take that to mean Ms. Valdivieso
13 worked with you for 48 -- 46 hours the week of July 11th
14 through 16th?

15 A I wouldn't know because there was a point
16 there when they reduced my hours by four hours.

17 Q Okay.

18 A And she -- I told her not to put those hours
19 in and she forgot it and put them in. And I reminded
20 her that that was wrong. And she said she was --

21 Q Okay. So, if I'm understanding you correctly
22 and please tell me if I'm wrong. What you're describing
23 is a situation where Ms. Valdivieso put down on the
24 weekly timesheet that she was with you for 42 hours.

25 A Right.

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1 Q And that you were only authorized to have an
2 aide with you for 38 hours.

3 A Right, but that was a mistake and I told her.

4 Q Okay.

5 A And she was supposed to have fixed it.

6 Q Okay. So, she was supposed to take off some
7 of the hours that she was with you?

8 A Yes, I told her that she had to do that paper
9 over again. Whether she did or not, I don't know.

10 Q Okay. If it -- if you were supposed to only
11 get 32 hours of care, but Ms. Valdivieso put down that
12 she was with you for 42 hours, would you have signed
13 that?

14 A No. And it wouldn't be 32 hours. It would
15 have been 38 hours.

16 Q 38, correct. So, the timesheet said 42, but
17 you were only authorized to have 38 hours of care, would
18 you have signed the sheet that said 42 or would you have
19 made --

20 A But I didn't note -- I didn't notice until
21 after they called our attention to it.

22 Q Okay.

23 A When they called and said that that was wrong,
24 I told her. I said, I told you to fix that before you
25 sent it in.

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1 Q Okay. And that sheet that said 42 hours on it
2 when you were only approved for 38 hours of care, does
3 that mean that Ms. Valdivieso was with you for 42 hours?

4 A No. That means she was with me for 38.

5 Q Okay. So, do you know why she would put 42?

6 A She forgot; she has another job. She had a
7 night job. She got into fixing her teeth and they're
8 charging her like \$20,000.

9 And she was working day and night. So, she
10 was very sleepy, very tired and she made a mistake. And
11 I called her to it.

12 Whether she fixed it or not, I don't know
13 because I don't follow her around.

14 Q Got you.

15 A But it was a mistake.

16 Q Okay. And what I'm trying to find out is, do
17 you know whether the mistake was -- Ms. Valdivieso was
18 with you for too many hours or that she put down more
19 hours than she worked?

20 A Huh?

21 MR. GOLDBERG: I don't think she understood
22 the question, Brian.

23 MR. POLLOCK: Sure.

24 BY MR. POLLOCK:

25 Q So, Ms. Melendez, I'm trying to find out kind

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1 of what you think happened and there's a couple
2 different ways that this could have -- this could've
3 happened, right.

4 One way is that Ms. Valdivieso said or wrote
5 down that she worked 42 hours, but she only worked 38,
6 right, that's --

7 A She was in a hurry. She was rushed. She was
8 overtired.

9 Q Understood.

10 A And anybody can make a mistake.

11 Q Okay.

12 A When I saw it, I told her, "This is wrong, you
13 have to fix it." She says, "Yeah, I will."

14 Q Okay.

15 A And that's all I know.

16 Q And what I'm getting at is, do you know
17 whether Daisy was with you for 42 or for 38 hours that
18 week?

19 A 38.

20 Q Besides how much she was approved for. Was
21 she actually with you -- do you know whether she was
22 there for 42 or 38 or you don't remember?

23 A 38.

24 Q Okay. And how do you know that?

25 A Because we had made the change already. She--

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1 I didn't sign every day. I signed once at the end of
2 the week.

3 So, I didn't know -- when I noticed it is when
4 I told her.

5 Q Okay.

6 A What she did after that, I don't know.

7 Q Got you. So, there was -- do you think -- so,
8 there was a mistake for about four hours that week?

9 A Yes. That was an honest mistake.

10 Q Fair enough.

11 A She was so tired -- she was so tired, she was
12 exhausted.

13 Q Okay. Diana Ramirez is attending this
14 deposition by video conference as well.

15 Has she ever been to your home?

16 A Yes.

17 Q When was the last time that she was at your
18 home?

19 A I don't remember.

20 Q Was it within the past couple of months?

21 A I don't know. I don't know. Too many things
22 have happened to me. I've fallen. I've gotten hurt.
23 I've gone through so much that I don't remember.

24 Q Do you know why she comes to your home? I'll
25 ask again.

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1 Do you know why she comes to your home?

2 A She came to my home because I asked her to
3 come.

4 Q And why was that?

5 A Because after Daisy left, she sent me somebody
6 that pretended to be such a nice person and begged me to
7 let her stay here. And then it turned out that she was
8 not the person I thought she was, and I didn't want her
9 here.

10 She was trying to, like take over the house.
11 So, I asked her to come and ask her to leave. That's a
12 whole different issue.

13 Q Understood. Sounds like it. Has Ms. McKinnon
14 come to your house?

15 A No. That's the owner, right?

16 Q Yes.

17 A No, I've never seen her before.

18 Q Okay. There's a couple of documents that look
19 like you hand wrote. One of them is from June 15th,
20 2023, this past year.

21 Did someone asked you to write that letter?

22 MR. GOLDBERG: Brian, I want to show her a
23 short copy to help with your questioning on that if
24 I may.

25 MR. POLLOCK: That's fine.

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1 MR. GOLDBERG: Okay. Just for the record Mr.
2 Court Reporter, this is a document that I have
3 marked as D2 in the lower right-hand corner and
4 it's dated June 15th, 2023. Brian, I e-mailed you-
5 -

6 MR. POLLOCK: Yeah.

7 MR. GOLDBERG: -- copies of these documents.
8 You got them?

9 MR. POLLOCK: I did. Thank you.

10 MR. GOLDBERG: Okay. Just want to make sure
11 everyone was referring to the same document.

12 MR. POLLOCK: Sure. It's also joined Exhibit
13 D. I think it's Plaintiff's --

14 MR. GOLDBERG: Yeah. ---

15 MR. POLLOCK: -- it's trial Exhibit D5. That's
16 the cross reference.

17 BY MR. POLLOCK:

18 Q Okay. Do you have that piece of paper in
19 front of you, Ms. Melendez?

20 A Yes.

21 MR. GOLDBERG: She's reading it right now,
22 Brian.

23 MR. POLLOCK: Perfect.

24 A Yeah, it talks about my condition.

25 BY MR. POLLOCK:

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1 Q Okay. Why did you write this letter if you
2 can remember?

3 A I was asked to.

4 Q Okay. Who asked you to write the letter?

5 A Mr. Goldberg's helper, investigator.

6 Q What did they tell you the reason was they
7 wanted you to write this letter?

8 A So, that I wouldn't have to go to court
9 because I can't go.

10 Q Okay.

11 A I'm literally in bed most of the day and
12 night. I'm only up because somebody was coming today.

13 Q Understood. And I'm trying to be as brief as
14 I can. But since you've been listed as a witness for
15 trial, I wanted to try to get some information from you.
16 And then --

17 A Oh, I see what this says. Oh, I see what
18 you're getting.

19 Q Okay. What am I getting at?

20 A That she -- Daisy -- she told me she would be
21 quitting All VIP Care. Therefore, she wouldn't be
22 working with me if I wanted her to continue working with
23 me, she suggested to go, to change agencies.

24 Q Did Daisy tell you --

25 A At that time she was --

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1 Q I'm sorry, I interrupted you.

2 A What?

3 Q I interrupted you, continue. I thought you
4 were done. I'm sorry.

5 A At the time she recorded some additional hours
6 was by mistake --

7 Q Okay.

8 A -- that's referring to the hours.

9 Q Okay.

10 A I had my hours reduced and she forgot and put
11 them down on the --

12 Q Okay. When you're talking about this, you're
13 referring to and reading from the letter, the June 15th
14 letter.

15 Ma'am, looks like you froze.

16 A I don't know because she -- that she's kept
17 insisting that I leave.

18 MR. GOLDBERG: Brian, did you hear Ms.
19 Melendez?

20 MR. POLLOCK: No.

21 MR. GOLDBERG: Brian, did you hear Ms.
22 Melendez, she was asking you.

23 MR. POLLOCK: We did not hear.

24 MR. GOLDBERG: All Right. Repeat what you
25 just said, Ms. Melendez.

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1 THE WITNESS: Up to what part did you hear?

2 THE COURT REPORTER: I was -- Court Reporter
3 speaking. I wasn't able to capture any of it, it
4 was all broken up.

5 MR. GOLDBERG: Okay. Why don't you start Ms.
6 Melendez at the point that you were referring to
7 the letter and that about your discussion with Ms.
8 Figuera with Daisy? About Daisy leaving All VIP
9 Care.

10 MR. POLLOCK: Randy, you're breaking up again.

11 THE WITNESS: --

12 MR. GOLDBERG: I'm giving her just for the
13 record, Brian, giving her back the Exhibit D2.

14 Don't worry about the rest of the papers Ms.
15 Melendez. Just look at that one we just need to
16 for the record.

17 THE WITNESS: Do you can hear me? He's not
18 hearing me.

19 MR. POLLOCK: We can hear you now.

20 MR. GOLDBERG: Folks, do you hear Ms.
21 Melendez?

22 MR. POLLOCK: We can hear you now.

23 MR. GOLDBERG: Okay. Go ahead, Ms. Melendez.
24 Go ahead, Ms. Melendez.

25 THE WITNESS: Where did you just stop hearing

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1 me from because I read the whole thing, and I added
2 something?

3 MR. GOLDBERG: Well, repeat what you added.

4 A Did you hear the whole thing that I read to
5 you? He's not hearing me. I don't know why.

6 BY MR. POLLOCK:

7 Q No, we didn't hear all of what you were
8 reading. And let me just clarify and say when in the
9 middle of your reading I asked, I didn't realize that
10 you were reading, and I asked if you were reading the
11 document.

12 So, I guess if you want to do that for us
13 again, you can read us what was on the June 15th letter
14 D2, and you can tell us the other information that
15 you're adding to that letter.

16 A Okay. I said, "I Angela Melendez, I'm hardly
17 standing that I am not able to go to the court. I have
18 been diagnosed with major depression plus other
19 illnesses.

20 When Daisy worked with me as an aide assisting
21 me, she told me she would be quitting. She told me she
22 would be quitting All VIP Care.

23 Therefore, she wouldn't be working with me.
24 And if I wanted her to continue working with me, she
25 suggested to change agency.

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1 And the time she reported some additional
2 hours was by mistake. I had my -- I had my hours
3 reduced and she forgot, and I put them down on time --
4 and she put them down on the timesheet, by mistake.

5 I repeat, it was an oversight. She had no bad
6 intention. I repeat, it was an oversight." Okay. I
7 said that.

8 She -- I can't even see him anymore.

9 MR. GOLDBERG: Don't worry about seeing him.

10 He can see you. That's the important part.

11 BY MR. POLLOCK:

12 Q Yes.

13 A Okay. She was very tired. She was -- she
14 hadn't had any sleep, much sleep for days. She was
15 working days with me and then in the evening and night
16 she would work with another client.

17 So, bad thing about this was that she kept
18 insisting that I leave the agency. That she wanted me
19 to leave the agency.

20 She kept insisting and telling me I wouldn't
21 help her. I had no intention of even the agency because
22 the agency didn't do anything to me.

23 She's the one that left. She's the one that
24 had the problem. That's not my problem. That's why I
25 refuse to be involved in this because I have no problem

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1 with VIP.

2 Q Okay.

3 A VIP has been good to me.

4 Q Did Daisy tell you why she was leaving All
5 VIP?

6 A Yeah, she kept insisting that they were
7 holding her money, her check. She was working a lot of
8 hours; they might have thought that she wasn't really
9 working them because it was a lot of hours.

10 But she honestly was working them because she
11 would come from the other house here very tired, and she
12 would be with me working very tired.

13 And then she would go home and sleep three,
14 four hours and then she would go to the next job again.
15 So, she honestly was very tired. But I guess they
16 didn't believe her, so.

17 Q Understood.

18 A Maybe they thought she was pretending to put
19 in hours that she wasn't doing. I know she was working
20 them because she was very tired, very sleepy.

21 Q Did Daisy live near you?

22 A Yeah, she moved next door to me. She was my
23 neighbor. But she got mad because I wouldn't leave the
24 agency and go to wherever she went.

25 Q Got you. When you say next door, I mean it

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1 was Daisy like literally the next apartment over, or
2 were she --

3 A Yes, literally the next apartment over. I
4 helped to get her that apartment.

5 Q Okay.

6 A We were neighbors. But now she's my enemy
7 because I wouldn't leave agency and I wouldn't help her.
8 I'm not going to say a lie. I'm a Christian.

9 Q Understood. When you say enemy, meaning you
10 guys you don't talk anymore, or she's moved out or what
11 do you mean by that?

12 A We don't talk anymore. She called me, I
13 talked to her and then she called me back and I had --
14 getting all agitated and like wanting to have an
15 argument or something, and.

16 I'm an old lady. I'm 77 years old. I'm not a
17 young girl to be fighting with anybody over a stupid
18 thing that had -- that was to me is ridiculous. To me
19 this whole thing is ridiculous.

20 Q Okay. I don't think I have any other
21 questions for you, Ms. Melendez. I don't know if Mr.
22 Goldberg does.

23 MR. GOLDBERG: I do have a few, Brian. Can
24 you hear me, okay Mr. Court Reporter?

25 THE COURT REPORTER: Yeah, I can hear you good

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1 for right now. If anything -- jump in if it gets--

2 MR. GOLDBERG: Okay. I'll try to talk as
3 clearly as I can, Ms. Melendez. Are you ready for
4 me, sir? May I proceed?

5 THE COURT REPORTER: Yes, yes. You may
6 proceed.

7 CROSS EXAMINATION

8 BY MR. GOLDBERG:

9 Q Okay. Ms. Melendez, I'm going to show you
10 another document. It's a two-page document. It's
11 marked as D1 which means Defendant Exhibit 1.

12 MR. GOLDBERG: Brian, I sent you a copy of
13 this as well and this is one of our joint exhibits
14 I believe for trial.

15 MR. POLLOCK: I think it's one of the Defense
16 exhibits. But otherwise, yes.

17 MR. GOLDBERG: Yes. Okay.

18 BY MR. GOLDBERG:

19 Q Ms. Melendez, this document I want you to look
20 it over and let me know if you recognize that document.
21 It's two pages.

22 And just for the record I hand to Ms. Melendez
23 the Exhibit D1. That's the page, ma'am. This is the
24 second page of that document.

25 Sorry, page -- there you go. Just for the

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1 record, I was directing Ms. Melendez to Page 2 of that
2 Exhibit D1.

3 MR. GOLDBERG: Mr. Court Reporter, I will e-
4 mail you these documents unless Brian wants to send
5 it to you so you can make it part of the
6 transcript.

7 THE COURT REPORTER: Okay. So, are you guys
8 marking this on the record? Or has this exhibit
9 have been previously marked?

10 MR. GOLDBERG: Well, I've got them marked on
11 my end. I don't know how Brian, how you want to
12 work, you know, do that with the Court Reporter.

13 But if it's okay with you, I have mark this D1
14 and D2, I can send them to the Court Reporter. And
15 I think we've described the documents well enough
16 so that we can clearly delineate between which
17 documents --

18 MR. POLLOCK: Yeah.

19 MR. GOLDBERG: -- are being examined by Ms.
20 Melendez.

21 MR. POLLOCK: Yeah, that's fine.

22 (Thereupon, Defendant's Exhibit D1 and D2 were
23 entered into the record.)

24 A Yeah, well this document --

25 BY MR. GOLDBERG:

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1 Q Okay. Okay. Ms. Melendez, are you ready to
2 comment on the document?

3 A Yes.

4 Q Okay. Ms. Melendez, do you recognize that
5 document?

6 A Yes.

7 Q What is that document?

8 A It's saying the same thing I already said.

9 Q And that -- is that document in your
10 handwriting?

11 A Yes.

12 Q Is that document signed by you on Page 2?

13 A Yes.

14 Q On the signature block. And that document was
15 notarized by Mr. Isaac Rodriguez?

16 A Yes.

17 Q Is that the gentleman who came and met you
18 here at your house?

19 A Yes.

20 Q From my office?

21 A Yes.

22 Q Okay. Is there anything in that document that
23 is different than in the first document which was dated
24 June 15th, 2023?

25 A Well, that one I might have forgotten a little

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1 bit of what I had put.

2 Q Okay. What additional information is in this
3 second document that's been signed to and notarized by
4 Mr. Rodriguez?

5 A Well, what I already told Mr. Rodriguez that
6 that she kept insisting I leave the agency and go, so
7 she could take care of me at another agency. And that
8 she kept insisting. And I refused to do it.

9 Q And because it's -- and correct me if I'm
10 wrong, and because you refuse to do that, the
11 relationship between you and Ms. Figuera has suffered?

12 A Yes. We are now supposedly enemies. I had to
13 block her because she -- the way she talked to me was
14 like having an encounter.

15 And I'm too old of a woman to be involved in
16 these petty things because if she's trying to make money
17 for some reason, I'm not. I mean, I want nothing to do
18 with them.

19 And I'm not going to lie. I'm not going to
20 say something that's not true.

21 The fact that she was very sleepy and the fact
22 that she made a mistake with her hours, that I still
23 insist that it was a mistake.

24 But if they can -- if they didn't pay her any
25 other hours like she was claiming, I have nothing to do

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1 with it. I don't know anything about it.

2 Just ever since she came to work for me, she
3 would be telling me that, the first week she'd say they
4 held my pay, they held my money, they held my money.
5 Sure, she wasn't clocking in because they all have the
6 same problem.

7 There's no internet in this apartment. So,
8 it's very difficult to clock in and clock out. So, then
9 they can -- they're not sure if they're working or not.

10 So, there's a problem there and that has to do
11 with the internet.

12 Q Understood. Did Ms. Figuera ever asked you to
13 pay her directly?

14 A No.

15 Q Okay. Did -- you mentioned at the beginning
16 of this deposition that you didn't take your memory meds
17 today.

18 A Right.

19 Q Has everything that you've testified to today
20 being true and accurate?

21 A Yes. And then -- and that papers you showed
22 me proof that I'm saying this, what exactly happened.
23 Just that I had forgotten a little bit of why things got
24 so bad between us.

25 Because she's a person that gets angry and

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1 loses her temper. I am a Christian and I give it up to
2 God. I have a problem, I don't go fight for it,
3 anything. I go -- I'm going to go to God.

4 Q Understood.

5 A So, I don't --

6 Q So, let me ask you this. So, the fact that
7 you didn't take your memory meds has not affected your
8 ability to give true and accurate testimony today?

9 A No, I don't think so.

10 Q And the two documents that you've looked at
11 during this deposition are Exhibit D1 and Exhibit D2
12 help with your recall of certain items?

13 A Yes, it did because I didn't remember I had
14 written that part down where she had to ask me to leave
15 the agency.

16 Q Understood.

17 MR. GOLDBERG: I have no further questions,
18 Brian.

19 MR. POLLOCK: I don't have anything. I don't
20 know that's even going to be ordered in time. But
21 Ms. Melendez, you have the ability to read the
22 written version or transcript of this deposition
23 for its accuracy.

24 You have to make arrangements with the Court
25 Reporter to do that or you could waive a reading. I

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1 don't represent you.

2 But most witnesses who don't have a dog in the
3 fight waive a reading and they trust that the Court
4 Reporter has taken down everything that you said
5 accurately. You have to say whether you're going
6 to read or waive.

7 So, that's my commentary and Mr. Goldberg will
8 tell you if something different if he feels any
9 differently.

10 MR. GOLDBERG: No, I was just going to say,
11 Brian, thank you. What Brian just said is correct.
12 The Court Reporters are very good about what they
13 do and I think that we can rely because he said you
14 don't have a dog in this fight that you can rely on
15 the Court Reporter taking down accurate testimony.

16 So if it's okay with you, if you want to waive
17 the reading, that's fine by me and obviously fine
18 by Brian.

19 THE WITNESS: What does that mean, waive the
20 reading?

21 MR. GOLDBERG: Because we need to print this
22 transcript. And -- but you have the right to look
23 to read the transcript before we get a copy to make
24 sure everything is correct.

25 But my position is, and I don't represent you

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1 either. My position or Brian's position is that we
2 are comfortable relying on the Court Reporter
3 having true and accurate taking down your
4 testimony.

5 THE WITNESS: Yes.

6 MR. GOLDBERG: Okay. So, are you going to
7 waive the reading?

8 THE WITNESS: I'm going to waive the reading.

9 MR. GOLDBERG: Okay. Mr. Court Reporter, do
10 you have that?

11 THE COURT REPORTER: Yeah. Thank you. Will
12 either side be ordering at this time?

13 MR. POLLOCK: I don't think so.

14 MR. GOLDBERG: Brian, you and I have to talk
15 off-record, and I have no further questions.

16 MR. POLLOCK: Okay. Thank you, Ms. Melendez,
17 for your time. Sorry to keep you up for so long,
18 but we try to be brief.

19 (Deposition concluded at 04:02 p.m.)

20 (Reading and signing of the deposition by the
21 witness has been waived.)
22
23
24
25

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CERTIFICATE OF REPORTER

STATE OF FLORIDA

COUNTY OF BROWARD

I, ARAMIS A. SANTOS, Court Reporter and Notary
Public for the State of Florida, do hereby certify that
I was authorized to and did digitally report and
transcribe the foregoing proceedings, and that the
transcript is a true and complete record of my notes.

I further certify that I am not a relative,
employee, attorney or counsel of any of the parties, nor
am I a relative or employee of any of the parties'
attorneys or counsel connected with the action, nor am I
financially interested in the action.

Witness my hand this 27th day of October, 2023.



ARAMIS A. SANTOS, COURT REPORTER
NOTARY PUBLIC, STATE OF FLORIDA

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CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF BROWARD

I, ARAMIS A. SANTOS, the undersigned authority,
certify that Angela Melendez, appeared before me
remotely pursuant to Florida Supreme Court Order AOSC20-
23 and was duly sworn on the 25th day of October, 2023.

Witness my hand this 27th day of October, 2023.



ARAMIS SANTOS, COURT REPORTER
NOTARY PUBLIC, STATE OF FLORIDA
Commission No.: HH 373549
Commission Exp: 3/15/2027

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